CHAPTER 2: COMMENT DOCUMENTS

This chapter is a compilation of all the documents that the Department of Energy (DOE) received during the public comment period on the *Draft Site-wide Environmental Impact Statement for Continued Operation of Lawrence Livermore National Laboratory and Supplemental Stockpile Stewardship and Management Programmatic Environmental Impact Statement.* The documents are presented alphabetically. On each document the first number represents the comment number within that document and the second number represents the issue summary code assigned to this comment. This number can be used to locate the summary and response relating to this comment. Section 1.3 describes the organization of this Comment Response Document and discusses the tables provided in Chapter 1 to assist readers in tracking their comments to the respective comment summary and responses. Chapter 3 provides comment summaries and DOE responses by category.

March 2005 2-1

Chapter 2 - Comment Documents

LLNL SW/SPEIS

A High School Student Page 1 of 1

A Livermore Employee Who Lives in Tracy, California Page 1 of 1

n lakka i konskilistoria, majasti lakki manan asha a akasi ming	Dear Mr Tom Grim
With Markette transfer of consensation (representation (september 1))	I would like to voice my opionon
1/37.01	of apposition on the Environmental Impact
2/35.01	Statement please don't make bombs and
	Dear Mr Join Grim I would like to voice my opimum of apposition on the Environmental Impact Statement please don't make bombs and anthrow near my home. —A high school student
emandrahasa la radione e completação de trastrumes e conservados.	-A high School
	student
	The state of the s
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or from the law and the law of th	
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E 100 CONTRACTOR MATERIAL	

Mr. Tom Grim Comment on the Site Wide Environmental Impact Statement The controlled burns at Site 300 are not discussed in any detail in the draft EIS, but now that the EPA has designated the region as one out of compliance with their guidelines on air quality, a more thorough discussion is needed. For example, what does the controlled 1/17.07 burning of brush add to the amount of pollutants in the atmosphere? Also since there are alternatives to burning such as mowing or in steep areas like Site 300 goats have been used to keep the vegetation down. Also Site 300 soil and water is contaminated with uranium and tritium, but no discussion is given on the amounts of these radioactive elements spread by the fires. For example, tritium monitors that give a constant read out of tritium release ring the Livermore site. There is no such set of monitors around Site 300. There is no explanation for this discrepancy. There is a proposal to release 200 curies of tritium a year from Site 300, which is similar to the amount of tritium, released 2/17.01 from the Livermore site. My other comment is terrorist attack. At the Livermore City Council meeting, you said all of the evaluations are classified. That is not factual. The GAO report and the POGO 3/30.01, report that were provided to Congress are both unclassified and fairly detailed. Why are the findings from thee reports not discussed in the draft EIS and why are they not 30.02 references since they are pertinent to a possible terrorist attack. Is Site 300 a possible target for attack with the radioactive materials used in testing? From, A Livermore employee who lives in Tracy California

2-2 March 2005

Aaland, Hans Page 2 of 4

Comment in regards to Nuclear Weopons plan
Fax 422-1776 TO TOM Grim. We are dead men walking. if we go against the clarity our utopia society gives is birth to. We must advance in moral progress to achieve a good relationship with the creator, with whom we can interact to. I've presented myself, interacting with Gol, 1/32.04 for many years, astore, I've quoted the Bible (mostly old testement prophet books). Since before 2001, I've been faxing 107.7 the Bone, and more recently faxing (both with toll free numbers) Jim Teel CHP, inspector in Sauramento. To both Jim

P12 044 and the radio station. I've claimed to be the guy on the Great Seal of California, I say I found it, you say Eureka, you'll know who'I, am by the response I get from all at the same time! Expect one to come who'll have barely hung, till he's figured out how we all can cornect 1/32.04 cont. inbetween, then shall God burst Jacobs bonds (see Teremiah 30:8) so that hone Shall make him afterd (verse 10). I Fear now, as I know even the President by now, must believe I am who I Say I am, if we don't see the wire between it all

Aaland, Hans Page 4 of 4

P3 of 4

1/32.04

cont.

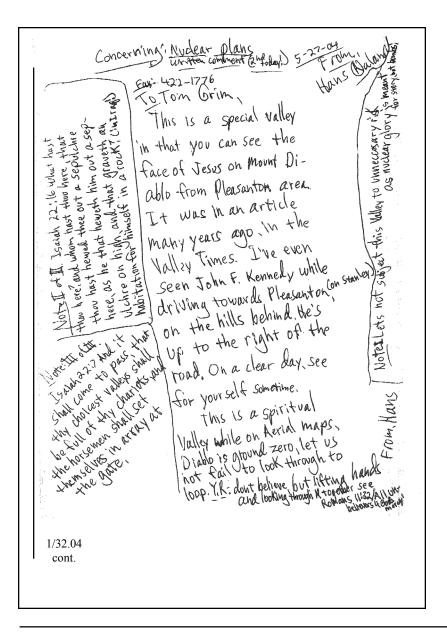
we'll not be able to cross to a better place when its revealed by Gods plan we're going the wrong direction.

I warned the President before he invaded Irag, with Isalah 22. If I had been Governor, like my couse deserves, we'll have been closer to verse 18/ the chariots of thy glory shall be the shame of thy lord's house. I'm against nuclear weapons!

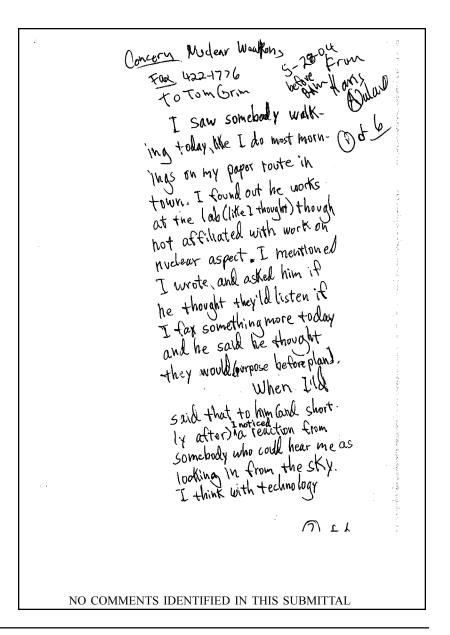
The defined what
the president claims to protect
by focusing (at least initially) on
the axis of evil with four letter
I'm able to consistantly climb
on top of my Giraffe (clongated)
Unicycle, and with four letters
I've found the axis I

lift up, and not just blunder. No Nokes or weapons to put us in du. can apply to every situation, and balance 1/32.04 cont. what is best. I.I.Y.R. Independent Interactive.

Yea Right, It gives us a rub between the letter and the immendiate surroundinas. Make the letter Y with inas. Make the letter Y with your arms lifted up, then your arms by the loop be-make an R by the loop be-make an R by cupping your in a formed by cupping your right hand towards the left; and connecting to your left hand and arm. Tik for Yea Right, and I.I., even it its Just saying to yourself yea Let us right, as I pass along. Its
right, as I pass along. Its
when people put us in batches, are
when people put us in batches, are
when people put us in batches, are
we now as we cant go through the udderness
we now as we cant



Aaland, Hans Page 1 of 6



Aaland, Hans Page 3 of 6

today, thats very possible, Someone whose attention I've stared could be watchina me closely. I'm glad, like tive invited a pop-ular radio station and the California Highway
Patrols top inspector to
tespect me as they do,
and give me my voice too. Preferably my voice first, asfore there was a CALP once, who prejudged me and came running after me white I was on my Graffe

PS(3) of b Unicycle! I was weaving in the wind with a big cardboard sign (I often carry, with something written on it) I'ld alreally checked out and around the turn around parking spot before the more was. Golden Gate bridge. Every thing seemed dear! Why all of a sudden was there a ct. P. Officer yelling at me and suddenly running after me?! I Knew I best level with him quick, so I dropped down off my unicycle

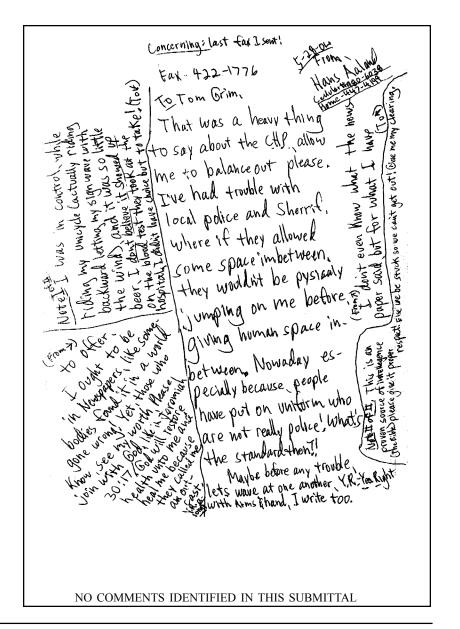
Aaland, Hans Page 5 of 6

ps Got it and innocently showed my concern about him. I delit manage to stop him before he began so determinely, and poping up from the Shaded walkway, over along the building. Before I knew It, I was being tackled by a bunch of officers. Now we're in a Wisp a cat with a wisker hospit a flecting Chance! I heard later, there was even an artide in the paper, while the seldom beer tid had earlier in theistill smelled from my breath I've

p 5 0+6 even heard I was written against in the S.F. Chronicle. A hight in prison at San Francisco, and though. they made the hospital take my blood, their report (Police) showed I refused the blood test. People's using words like they don't have anything to do with the truth, I'll Say! Far cry from I.L. Yell Just a plan enamed with no means of changmay them, once it's de-Cited. Y.R.I. The difference between me and you is

Aaland, Hans Page 1 of 1

I give arms length to
the things I approach before I jump in head long and study things
so as I don't miss the
act of God that can
for give all and give us
a new standard to work
a new standard to work all at once ! We are all quity and God whose voice I know tells us to give arms length in unbelief as in Romans 11:32 God condudes everyone in unbelief that he may have mercy on all. IIYR-Inkependent Interactive, Yea Right, we lift up our arms each, as it our defence is each soul relents.



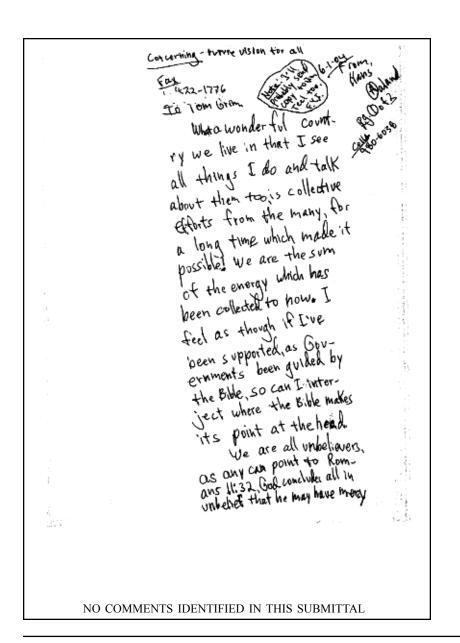
2-8

Aaland, Hans Page 2 of 2

Concern: Future Viston / Please til years off, yet I talk of and direct to the scripture Hagga 3:9, to combat tertorisms threat today! It is written; For then will I turn to the people a pure language, that they may call upon the name of the LORD, to serve him with one concent. Vs. 8 Therefore wait ye upon me, saith the LORD, until the day that I rise up to piey ! for my determination is to gather thenations, that I way assemble the Kingdims, to pour upon them myne industriation, even all my fierce anger: for all the earth NO COMMENTS IDENTIFIED IN THIS SUBMITTAL

shall be devoured with the Allow me to introduce myself for in Gold to I delightish the Fre of my Jealousy. ZI said, Surely than with few me, then will receive instructions, so their dwelling should not be cut off howsoever I punished them; but they rose early, and corrupted all their doings. 16 In that day it shall be said to Jarusalan Fear thou not . and to Znon, Let not thine hands be slack. 12 The LORD thy God will lest in Mis love, he will Joy over three with singles

Aaland, Hans Page 2 of 2



on all. Yea right, you say.

Y.K., I too, let us breath
in between, and see what
God can do. On ing between 11:32! 1918] 153, and I after 2 is 321, walk this way come together over me! Spiritual connection and Gods Jedowy will be Stirred* Even all this les of the heather will worship God, everyone from his place. (Zephantah 2:11). Whom we can detire the line between all, all can be directed, as for 't has a nycleous by which if any is out, it need but

2-10 March 2005

Abrahamson, Carl C. Page 1 of 1

---Original Message--From: Mary Abrahamson [mailto:mabrason@hickorytech.net] Sent: Wednesday, May 12, 2004 7:06 PM To: tom.grim@oak.doe.gov Subject: nuclear weapons

1/01.01. 01.03

Now is the time to end the nuclear threat. The only way to do that is for the two most threatening nations to disarm. Yes, I am talking about Russia and the US. According to statistics, both nations have over 8,000 warheads still in their stockpile. More than 2,000 of our nations missiles are on hair trigger. This means that a president with a hair trigger temper (like Bush) could end the lives of 10's of millions of innocent people with a quick button push. This will truly 2/32.02 be the end of the world as we know it. Sincerely, Carl C. Abrahamson, concerned citizen.

Alameda County Flood Control and Water Conservation District, Jim Horen, Principal Engineer, Advance Planning Section Page 1 of 4



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

5997 PARKSIDE DRIVE | PLEASANTON, CALIFORNIA 94588-5127 | PHONE (925) 484-2600 FAX (925) 462-3914

May 27, 2004

Mr. Thomas Grim, Document Manager National Nuclear Security Administration United States Department of Energy Livermore Site Office, L-293 7000 East Avenue, Livermore, CA 94550-9234

> Re: Draft Site-Wide Environmental Impact Statement for Continued Operation of Lawrence Livermore National Laboratory and Supplemental Stockpile Stewardship and Management Programmatic Environmental Impact Statement (Draft LLNL SW/SPEIS)

Dear Mr. Grim:

Zone 7 has reviewed the referenced NEPA document in the context of our mission to provide drinking water, non-potable water for agriculture and irrigated turf, flood protection, and groundwater and stream management in the Livermore-Amador Valley. Our understanding is that the proposed project consists of the continued operation of the LLNL, including foreseeable future operations, facilities, and activities, which include proposed modifications to existing projects and new programs. Our comments on the Environmental Impact Statement are as follows:

 $Page \ S-10 \ to \ S-12, Paragraphs \ S.5.1.1 \ to \ S.5.1.10, National \ Ignition \ Facility, Bio Safety \ Level \ 3$ Facility, Terascale Simulation Facility, Container Security Testing Facility, International Security Research Facility, etc.

These paragraphs state that certain new facilities are currently under construction or will be in the future. The total impervious area will likely increase due to the planned construction of over 450,000 square feet of new facilities that could lead to additional runoff. The changes in pervious area and impervious area should be clarified. If there will be an increase in impervious area over the existing improvements then Zone 7's standard practice is to assess new development with Special Drainage Area 7-1 (SDA 7-1) drainage fees. Fees are collected for any development creating new impervious areas that would contribute runoff to Zone 7's flood control facilities.

1/18.04

Zone 7 has flood control facilities, Line P (Arroyo Seco) and Line P-1 (Re-located Arroyo Las Positas), adjacent to the LLNL site, i.e., southwest and northwest, respectively. The increased impervious areas proposed will most likely lead to additional runoff to these facilities. A hydraulic study should be performed to show that the additional runoff will not have an adverse effect on the 100-year water surface elevation in our facilities.

Page S-10, Paragraph S.5.1.2, BioSafety Level 3 Facility

2/35.01

This paragraph states that the BLS-3 Facility would provide for environmentally safe and physically secure manipulation and storage of infectious micro-organisms, many of which are potential bioweapon agents. Reference should be made to our enclosed letter, dated August 23, 2002, on the Draft Environmental Assessment for Proposed Construction and Operation of this BLS-3 facility. Since, we have not received the Final Environmental Assessment and this facility

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Alameda County Flood Control and Water Conservation District, Jim Horen, Principal Engineer, Advance Planning Section Page 2 of 4

Mr. Thomas Grim National Nuclear Security Administration United States Department of Energy May 27, 2004 Page 2

2/35.01 cont.

is scheduled to begin operation this year, please note that our primary concern for this facility has not been addressed. Our specific concern is that infectious materials, biotoxins, or pharmaceuticals might reach the groundwater through one of the above pathways identified in the August 23, 2002 letter.

3. Pages SW/S

Pages 5-2-40, 5-3-33, and 5.4-27, Sections 5.2.9, 5.3.9, and 5.4.9, Volume 1 of Draft LLNL SW/SWP FIS

3/28.01

The document states, "Compliance with an approved erosion and sedimentation control plan during construction would prevent impacts to surface water from construction-induced erosion." Permanent post-construction stormwater management controls should also be included in a stormwater pollution prevention plan, as appropriate, to limit discharge of sediment.

Also, please submit for Zone 7 review all future plans and specifications pertaining to the proposed improvements at the LLNL site and Site 300, and any other pertinent information or studies, to John Koltz, Senior Engineer, Advance Planning.

We appreciate the opportunity to comment on this document. Please feel free to contact Jack Fong at (925) 484-2600, ext. 245, or myself at ext. 400 if you have any questions or comments.

Very truly yours,

Jim Horen Principal Engineer Advance Planning Section

JH:JF:arr

Encl.

c: Ed Cummings John Mahoney Dave Lunn

> Matt Katen John Koltz

Joe Seto Mona Olmsted Jack Fong

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Alameda County Flood Control and Water Conservation District, Jim Horen, Principal Engineer, Advance Planning Section Page 3 of 4



Mr. Richard Mortensen, DOE NEPA Document Manager United States Department of Energy Livermore Site Office, L293 P.O. Box 808 Livermore, CA 94551

Re: Draft Environmental Assessment for Proposed Construction and Operation of a Biosafety Level 3 Facility at Lawrence Livermore National Laboratory

Dear Mr. Mortenser

Zone 7 has completed its review of the referenced NEPA document. Our understanding is that the proposed project consists of the construction and operation of a 1,500 square-foot laboratory facility within the Lawrence Livermore National Laboratory (LLNL) site. The site for this facility is approximately 0.25 acres. It currently consists of paved parking and a road in the vicinity of Building 360 complex.

Our comments are made in the context of Zone 7's responsibilities within its service area to provide wholesale treated water, untreated water for agriculture and irrigated turf, stream management and flood protection, and groundwater management. Zone 7 does not have any existing or planned flood control facilities nor water production/transmission in the project vicinity.

4/35.01

The draft environmental assessment states that wastewaters generated by this facility will be disposed of to the City of Livermore's sanitary sewer system. Municipal sewer systems typically have leaking pipe joints. Also, the City of Livermore recycles a portion of its treated wastewater for turf and landscape irrigation over the Valley's main groundwater basin, and it may also someday store recycled wastewater in one of Zone 7's Chain of Lakes. Our primary concern for this project is that infectious materials, biotoxins, or pharmaceuticals might reach the groundwater through one of the above pathways. Our comments have been organized to follow the order of the draft environmental assessment, as follows:

1. Page 8, Proposed BSL-3 Facility Location and Construction Measures

This paragraph mentions that the proposed project would be within an existing paved parking area. If construction is contained to the existing paved parking area, a drainage fee for Zone 7's Special Drainage Area (SDA) 7-1 may not be required, since no impervious area would be created. However, if the construction does create new impervious area, it will be subject to SDA 7-1 drainage fees.

Pages 22 and 23, Waste Generation at the BSL-3 Facility

The first paragraph on page 23, states that "soluble or liquid waste materials generated from laboratory operations can be disposed of in the laboratory sinks after first being treated with disinfectants." Please confirm that simple disinfection will be adequate for all constituents of concern. Will disinfection always be performed?

2-12 March 2005

Alameda County Flood Control and Water Conservation District, Jim Horen, Principal Engineer, Advance Planning Section Page 4 of 4

Mr. Richard Mortensen, DOE NEPA Document Manager United States Department of Energy August 23, 2002 Page 2

3. Page 34, Sanitary Liquid Waste and Page 45, Waste Management

This paragraph states that "...liquid wastes as generated from the proposed BSL-3 laboratory operations would be discharged to a retention tank system, for containment, characterization, and disinfection as needed, prior discharge to the sanitary sewer system." Whereas the second paragraph on page 45 states that "There would be no retention tanks or need for waste accumulation areas since no hazardous waste would be produced..." These statements need clarification.

4 /35.01 cont.

If the liquids are going to go to a retention tank for "containment, characterization, and disinfection as needed" please provide some discussion as to the process which determines whether disinfection is needed. The sentence on page 34 that states "...no discharge limits currently exist for infectious materials which are commonly discharged by healthcare and veterinary facilities and laboratories or homes" does not justify ignoring the need for monitoring, but instead, might point to possible flaws in the existing regulations. Are the potential discharges from a BSL-3 facility the same as those for healthcare and veterinary facilities and laboratories or homes?

 Pages 39-41, Potential Pathways for Infectious Agents to Escape BSL-3 Containment, Waterborne Transmission

In the paragraph on Water-borne Transmission, page 41, it states "Water exiting through the sink drains would be disinfected, if necessary, and would be diluted by mixing with sanitary wastewater in the sewer system and at the LWRP facility." As mentioned above, what determines whether disinfection will be needed? Will disinfection and dilution be effective for all of the potential constituents of concern? What is the potential for discharge of pharmaceutical pollutants? What is the potential for discharge of resistant strains of bacteria and viruses?

Please feel free to call me at (925)-484-2600, ext. 400, or Jack Fong at ext. 245 if you have any questions or comments.

Sincerely,

Jan do por

Principal Engineer Advance Planning Section

JH:JF:jr

cc: Ed Cummings
John Mahoney
Yan Kee Chan
Dave Lunn

Diana Gaines Matt Katen Jack Fong

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Allen, Karen Page 1 of 1

RE: Comments on the Department of Energy's Site-Wide Environmental Impact Statement (SWEIS) for Continued Operations at Lawrence Livermore National Laboratory (LLNL).

Dear Mr. Grim:

Our world is becoming increasingly more dangerous. The nations of the world should be decreasing the number and lethality of weapons, including nuclear weapons, and the U.S. should be in the forefront of that effort. Sadly (embarrassingly), such is not the case.

To my mind, designing new nuclear weapons, when we should be destroying all nuclear weapons, is simply unconscionable. It heads the "What Are They Thinking!" top 10 list for wickedly despicable ideas

1/04.01

The U.S. is now viewed by other nations as a rogue nation, intent on dominating the world. If we allow ourselves to continue down this path..we simply must NOT continue down this path! We must rejoin the community of nations and work together to make the world a better place.

I care about my children and grandchildren. I want them to have a beautiful world to live in: a nuclear arms race, which will be the result of continued and expanded operations at LLNL, is incompatible with my hopes and dreams for my children.

Please do not do this!

-Karen Allen 1430 Bel Air Drive, #101 Concord, CA 94521